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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

EPIC GAMES, INC.,

*Plaintiff, Counter-defendant,*

v.

APPLE INC.,

*Defendant, Counterclaimant.*

Case No. 4:20-cv-05640-YGR

IN RE APPLE IPHONE ANTITRUST  
LITIGATION

Case No. 4:11-cv-06714-YGR

DONALD R. CAMERON, *et al.*,

*Plaintiffs,*

v.

APPLE INC.,

*Defendant.*

Case No. 4:19-cv-03074-YGR

**JOINT STATEMENT REGARDING  
VALIDATION OF DOCUMENT  
PRODUCTIONS**

Judge: Hon. Yvonne Gonzalez Rogers

1                   **Joint Statement:** In connection with negotiations concerning a draft protocol to  
2 govern discovery of electronically stored information in the above-captioned actions, Plaintiffs  
3 and Defendant Apple Inc. (“Apple”) (collectively, “the Parties”) filed with the Court a joint  
4 statement on October 26, 2020, stating in part that the Parties continued to meet and confer  
5 regarding validation procedures to test the sufficiency and accuracy of the Parties’ productions.  
6 The Parties stated that they had agreed to either (i) reach agreement on validation procedures by  
7 November 9, 2020, or (ii) if the Parties cannot reach agreement, submit any outstanding issues in a  
8 joint statement to Magistrate Judge Hixson by November 9, 2020. The Parties have made  
9 progress in negotiations but have not yet reached agreement on validation procedures.

10                   The Parties have agreed to continue negotiations and either (i) reach agreement on  
11 validation procedures by November 13, 2020, or (ii) if the Parties cannot reach agreement, submit  
12 any outstanding issues in a joint statement to Magistrate Judge Hixson by November 13, 2020.

1 Dated: November 9, 2020

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9 Dated: November 9, 2020

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11  
12 **E-FILING ATTESTATION**

13 I, Jay P. Srinivasan, am the ECF User whose ID and password are being used to file  
14 this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the  
15 signatories identified above has concurred in this filing.

16  
17 /s/ Jay P. Srinivasan

18 Jay P. Srinivasan